

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

---

HARBOR ASSOCIATES LIMITED  
PARTNERSHIP, a Florida limited partnership,  
  
DR. KRISHNA P. SINGH,  
  
KAPEX I, LLC, a Florida limited liability company,  
  
and  
  
MULTI-DECADES TRUST, d/b/a  
Harbor Associates Limited Partnership  
  
Plaintiffs,  
  
v.  
  
STIMGUARD, LLC, a Bahamas limited liability  
company;  
  
MICRON DEVICES, LLC, a Delaware limited  
liability company;  
  
LAURA PERRYMAN;  
  
DR. SANJAY GUPTA;  
  
STIMQ MEDICAL, LLC, a Bahamas limited  
liability company;  
  
and JOHN DOES 1 – 10,  
  
Defendants.

---

Civil Action

Case No.: 2:18-CV-03235-WB

**STIPULATED [PROPOSED FORM OF] ORDER TO SET ASIDE ENTRY OF  
DEFAULT PURSUANT TO FED. R. CIV. P. 55(c) AND FED. R. CIV. P. 60(b)(4),  
AND DISMISS COMPLAINT AND FIRST AMENDED COMPLAINT  
PURSUANT TO FED R. CIV. P. 41(a)(1)(A)(ii) and (A)(2)**

Plaintiffs Harbor Associated Limited Partnership, a Florida limited partnership; Dr.  
Krishna P.Singh; Kapex I, LLC, a Florida limited partnership; and Multi-Decades Trust, d/b/a

Harbor Associates Limited Partnership and defendants, StimGuard, LLC, a Bahamas limited liability company (“StimGuard”); Micron Devices, LLC, a Delaware limited liability company (“Micron”); the Board of Directors of Micron (together with Micron, the “Micron Defendants”); Laura Perryman (“Ms. Perryman”); Dr. Sanjay Gupta (“Dr. Gupta”); and StimQ Medical LLC, a Bahamas limited liability company (“StimQ”, and collectively with StimGuard, the Micron Defendants, Ms. Perryman and Dr. Gupta, the “Defendants”) hereby stipulate subject to order by the United States District Court for the Eastern District as follows:

1. The entry of default against the Micron Defendants is set aside;
2. The above captioned matter is dismissed without prejudice.

***Respectfully submitted and approved as to form:***

**Counsel for Plaintiff**

Weisberg Law

By: /s/ Matthew B. Weisberg  
Matthew B. Weisberg, Esq.  
Attorney No. 85570  
7 South Morton Avenue  
Morton, PA 19070  
Tele: (610) 690-0801  
Fax (610) 690-0880  
e-mail: [mweisberg@weisberglawoffices.com](mailto:mweisberg@weisberglawoffices.com)

**Counsel for defendant Dr. Gupta**

Law office of Joseph P. Howard, LLC

By: /s/ Joseph P. Howard  
Joseph P. Howard, Esq.  
Attorney No. 309938  
1920 Fairfax Avenue  
Cherry Hill, NJ 08003  
Tele : (856) 282-1318  
e-mail: [jhoward@jph-law.com](mailto:jhoward@jph-law.com)

***Counsel for the StimGuard Defendants; the  
Micron Defendants; Ms. Perryman; and the  
StimQ Defendants***

The Williams Law Firm, P.A.

By: /s/ John L. Williams  
John L. Williams, Esq.  
Attorney No. 88738  
1201 N. Orange Street, Suite 600  
P.O. Box 511  
Wilmington, DE 19899- 0511  
Tele: (302) 575-0873

Fax: (302) 575-0925

E-mail: John@TrustWilliams.com

**Court Approval**

SO ORDERED:

Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Wendy Beetlestone